THE HONORABLE RICARDO S. MARTINEZ

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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOSEPH SANT, MERTON CHUN, RONESHA SMITH, and HEATHER NICASTRO, individually and on behalf of all others similarly situated

Plaintiffs,

VS.

ROCKETREACH LLC,

Defendant.

Case No. 2:24-cv-1626-RSM

STIPULATED MOTION TO EXTEND RESPONSE AND REPLY DEADLINES PERTAINING TO DEFENDANT'S MOTION TO DISMISS, MOTION TO STRIKE, AND MOTION TO COMPEL ARBITRATION

STIPULATION

WHEREAS, Plaintiffs Joseph Sant, Merton Chun, Ronesha Smith, and Heather Nicastro (collectively, "Plaintiffs") filed Case No. 2:24-cv-1626 against RocketReach LLC ("Defendant") on October 8, 2024;

WHEREAS, Defendant was served with Plaintiffs' Complaint on October 23, 2024;

WHEREAS, Defendant on December 27, 2024 filed a Motion to Dismiss (ECF No. 18), a Motion to Strike Class Allegations (ECF No. 19), and a Motion to Compel Arbitration and Stay Proceedings (ECF No. 16) (taken together, the "Motions");

WHEREAS, Plaintiffs' current deadline to respond to the Motions is February 11, 2025;

WHEREAS, Plaintiffs' counsel has numerous interceding briefing deadlines and arguments in other matters before February 11, 2025;

WHEREAS, Defendant's current deadline to reply to Plaintiffs' anticipated responses is

February 18, 2025;

STIPULATED MOTION TO EXTEND RESPONSE AND REPLY DEADLINES PERTAINING TO DEFENDANT'S MOTION TO DISMISS, MOTION TO STRIKE, AND MOTION TO COMPEL ARBITRATION - 1 Case No. 2:24-cv-1626-RSM

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1 WHEREAS, Defendant's counsel has numerous interceding briefing deadlines in other 2 matters before February 18, 2025; 3 THEREFORE, Plaintiffs and Defendant hereby STIPULATE AND AGREE to extend the 4 deadline for Plaintiffs to respond to the Motions to March 13, 2025 and the deadline for Defendant 5 to reply to Plaintiffs' anticipated responses to April 14, 2025. This stipulation shall not operate 6 as an admission of any factual allegation or legal conclusion, nor shall it operate as a waiver or 7 otherwise affect any right, defense, claim or objection by any party. 8 Stipulated to this 21st day of January, 2025. 9 Presented and stipulated to by: 10 NICK MAJOR LAW 11 12 By: /s/ Nick Major 13 Nick Major, WSBA #49579 450 Alaskan Way S., #200 14 Seattle, WA 98104 Email: nick@nickmajorlaw.com 15 Attorneys for Plaintiffs 16 HEDIN LLP 17 By: /s/ Tyler K. Somes 18 Tyler K. Somes, Pro Hac Vice 1100 15th St NW, Ste. 04-108 19 Washington, D.C. 20005 Email: tsomes@hedinllp.com 20 Attorneys for Plaintiffs 21 Stipulated to by: 22 WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP 23 By: /s/ Patrick G. Lynch 24 Patrick G. Lynch, WSBA #53147 25 520 Pike St., Ste. 2350 Seattle, Washington 98101 **26** Patrick.Lynch@wilsonelser.com Attorney for RocketReach LLC. 27

STIPULATED MOTION TO EXTEND RESPONSE AND REPLY DEADLINES PERTAINING TO DEFENDANT'S MOTION TO DISMISS, MOTION TO STRIKE, AND MOTION TO COMPEL ARBITRATION - 2
Case No. 2:24-cv-1626-RSM

ORDER

IT IS SO ORDERED.

DATED this 27th day of January, 2025.

RICARDO S. MARTINEZ

UNITED STATES DISTRICT JUDGE